

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

K.C., *et al.*,

Plaintiffs,

v.

No. 1:23-cv-00595-JPH-KMB

THE INDIVIDUAL MEMBERS OF THE
MEDICAL LICENSING BOARD OF
INDIANA, in their official capacities, *et al.*,

Defendants.

Declaration of Nathaniel Clawson and Beth Clawson

Come now Nathaniel Clawson and Beth Clawson, being duly sworn and say that:

1. We are adult residents of Monroe County, Indiana, and are married to each other.
2. We are the parents of plaintiff K.C.
3. K.C. is currently ten years old.
4. Although K.C.'s birth-assigned sex was male, she has lived as a girl since before she was four.
5. When she was three, she grabbed a pair of scissors after leaving her bath and asked if she could cut off her penis.
6. Shortly thereafter she was diagnosed by a doctor as having gender dysphoria.
7. Since before she was four, she has lived as a girl and consistently has presented herself as a girl, wearing girls' hairstyles and clothing. In fact, at an early age she would

refuse to leave the house unless she was wearing a dress or tutu. The gender marker on her birth certificate has been changed to female.

8. By the time she was 4 or 5 she wanted to wear make-up to make herself look as feminine as possible.

9. Her gender dysphoria has triggered severe anxiety and depression and she has been in therapy periodically since she was very young to try to help her cope with the mental health difficulties that the gender dysphoria has caused.

10. She has been a patient of the Riley Gender Health Program since she was 4. The Riley Gender Health Program is operated by Riley Children's Hospital and Indiana University Health and offers comprehensive medical care and other support to children, teens, and young adults under the age of 21 who, among other things, suffer from gender dysphoria.

11. K.C. recently began the first stages of puberty, and she has an appointment for later this month for a subcutaneous insertion of a device that will deliver Supprelin LA to her. This is a puberty blocking drug.

12. The advantage of delivering the puberty blocker in this manner is that it is long-lasting and will not require frequent injections. The reason we elected this method was because of our fear that after July 1, 2023, our daughter would not be able to obtain a puberty blocker because of S.E.A. 480.

13. We agreed to our daughter receiving puberty blocking drugs only after medical personnel at Riley thoroughly explained to us and our daughter the benefits and potential negative side effects of the puberty blocking drugs.

14. We have noted that with the advent of puberty that our daughter's anxiety, depression, and other symptoms of gender dysphoria are increasing.

15. For example, approximately 6 months ago she noticed that her armpits began to smell different, a circumstance that she attributed to male puberty. This made her extremely upset. She insisted on immediately taking a shower and when this has continued to occur, she will do what she can to remove the odor. This sign of maturation continues to be a point of stress and discomfort for her. She avoids looking in a mirror and she has extreme concerns about changes in her body making her look more masculine. She is reluctant to even let her doctors see her body.

16. We have seen our daughter struggle with the profound negative effects of gender dysphoria, and she is eagerly awaiting the administration of the puberty blocking drugs from Riley Gender Health Program. She desperately wishes to remain a girl.

17. If she is denied the ability to receive puberty blocking drugs it will be devastating to her as there will be no way to control the negative consequences of her gender dysphoria.

18. If she is condemned to having to suffer through male puberty and is denied the ability to be the girl that she truly is, it will be catastrophic.

19. Assuming they are deemed to be appropriate by her medical providers, we will want our daughter to receive female hormones when she is able to do so. She has already spoken of wanting the hormones to assist her being a girl and recognized as a girl.

20. We have watched our daughter struggle through the serious problems caused by her gender dysphoria, and we recognize that the puberty blocking drug is a medical necessity for her.

21. As noted, we have been well informed by her medical practitioners as to the benefits and potential negative consequences of the puberty blocking drug and we have made the informed choice to begin this necessary treatment and she needs to continue receiving this necessary treatment even after July 1, 2023.

22. We strongly believe that it is our right as parents to make this choice, in consultation with our daughter and her doctors, and we also believe that the State has no business in interfering with our ability to get our daughter this care.

Verification

We verify under penalty of perjury that the foregoing is true and correct.

Executed on: April 17, 2023



Nathaniel Clawson



Beth Clawson

Prepared by:

Kenneth J. Falk
ACLU of Indiana